

1/350  
**MAM**

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

Ronald Slaughter  
1754 S. Ringold St.  
Philadelphia, PA 19102

Plaintiff,

Civil Action

NO: 09 0212

V.

LaSalle University  
1900 W. Olney Ave.  
Philadelphia, PA 19141

De LaSalle Christian Brothers  
2535 Buckeystown Pike  
Adamstown, MD 21710

Formerly

Philadelphia Catholic League  
222 N. 17<sup>th</sup> St.  
Philadelphia, PA 19103

Court of Common Pleas  
Philadelphia County  
Trial Division – Civil  
March Term 2008  
No. 000230

Contemporary Services Corp.  
One Lincoln Financial Fieldway  
Philadelphia, PA 19148

Defendants,

V.

City of Philadelphia  
1515 Arch Street  
Philadelphia, PA 19102

Additional Defendants.

**NOTICE OF REMOVAL**

**To the Honorable Judges of the United States District Court for the Eastern District of Pennsylvania.**

Pursuant to 28 U.S.C. § 1441, defendant, The City of Philadelphia (hereinafter “petitioners”) through their counsel, Jeffrey S. Simons, Assistant City Solicitor, respectfully petition for the removal of this action to the United States District Court for the Eastern District of Pennsylvania. In support thereof, defendants state the following:

1. In March 2008, plaintiff initiated this action by a Complaint in the Court of Common Pleas in Philadelphia, March 2008, No. 000230. (Exhibit A).

2. On December 19, 2008 said Complaint was served on Petitioners at 1515 Arch Street, 14th Floor, Philadelphia, Pennsylvania.

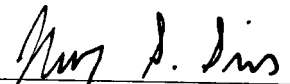
3. Defendant, Contemporary Services Corporation alleges that on March 4, 2006, Plaintiff sustained damages when his civil rights were violated by defendant, The City of Philadelphia (Exhibit A ).

4. This action may be removed to this Court pursuant to 28 U.S.C. § 1441 since Plaintiff's Complaint contains allegations of violations of the plaintiff's Federal Civil Rights and seeks relief under 42 U.S.C. § 1983. (Exhibit A)

**Wherefore**, petitioner, The City of Philadelphia, respectfully requests that the captioned Complaint be removed to the United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

Jeffrey S. Simons  
Assistant City Solicitor

  
**JEFFREY S. SIMONS**  
**Assistant City Solicitor**  
**Attorney I.D. No. 93784**  
1515 Arch Street, 14<sup>th</sup> Floor  
Philadelphia, PA 19102  
215-683-5445

Date: 1/15/09

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**NOTICE OF FILING OF REMOVAL**

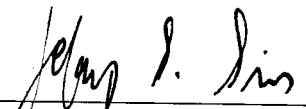
TO: SILVERS, LANGSAM & WEITZMAN, P.C.  
Dean I. Weitzman, Esq.  
Two Penn Center Plaza, Suite 1410  
15<sup>th</sup> & John F. Kennedy Blvd.  
Philadelphia, PA 19102

POST & SCHELL, P.C.  
Andrew J. Connolly  
William L. Thrall, III  
Four Penn Center, 13<sup>th</sup> Floor  
Philadelphia, PA 19103

STRADLEY, RONON, STEVENS & YOUNG, LLP  
Leslie M. Greenspan  
2600 One Commerce Square  
Philadelphia, PA 19103

PLEASE TAKE NOTICE THAT on January 14, 2007, defendant, City of Philadelphia filed, in the office of the Clerk of the United States District Court for the Eastern District of Pennsylvania a verified Notice of Removal.

A copy of this Notice of Removal is attached hereto and is also being filed with the Clerk of the Court of Common Pleas of Philadelphia County, pursuant to Title 28, United States Code, Section 1446(e).

  
**JEFFREY S. SIMONS**  
**Assistant City Solicitor**  
**Attorney I.D. No. 93784**  
City of Philadelphia Law Department  
1515 Arch Street, 14<sup>th</sup> Floor  
Philadelphia, PA 19102  
215-683-5443



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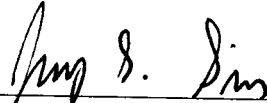
**CERTIFICATE OF SERVICE**

I, Jeffrey S. Simons, Assistant City Solicitor, do hereby certify that a true and correct copy of the attached Notice of Removal has been served upon the following by First Class Mail, postpaid, on the date indicated below:

TO: SILVERS, LANGSAM & WEITZMAN, P.C.  
Dean I. Weitzman, Esq.  
Two Penn Center Plaza, Suite 1410  
15<sup>th</sup> & John F. Kennedy Blvd.  
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**Assistant City Solicitor**  
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Date: 1/15/09